

'152 Patent Claim Terms	Honeywell's Proposed Construction	Support
<b>Claim 1<sup>1</sup></b>		
1. A data communications system for retrieving data information, said data communications system comprising:		
a <b><u>data source</u></b> comprising a <b><u>network system</u></b> for the storage and delivery of the data information;	<p><b>Data source:</b> Honeywell believes this claim phrase does not require construction, but if the Court is inclined to construe the phrase, its plain meaning is "A source of data."</p> <p><b>Network system:</b> a network, for communicating requests to the data source.</p>	<p><b>'152 Patent.</b> '152 col.2 l. 64 to col.3 l. 2 ("The data source 104 may comprise any appropriate source of data, such as an internet service provider (ISP), a host computer system, a remotely accessible network server, a dedicated or general information database configured to store selected information, or other information sources capable of transmitting requested information.")</p> <p><b>'152 Patent.</b> '152 col.8 ll.60-64 ("network system 314 can be a private network or a public network, such as a telephone network or television cable network, or any other suitable system for communicating the request to the data source 104.")</p>
an <b><u>information request system</u></b>	<b>Information request system:</b> Honeywell believes this claim	<b>'152 Patent.</b> '152 col.5 ll.31-38 ("The information request system 102 is configured to enable a system

<sup>1</sup> Construed terms are noted only in the first instance for each claim series in which the term is used, but the same construction applies to all other instances in each claim series unless noted otherwise.

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<p>comprising a <b><u>transmission unit</u></b> coupled to said data source and adapted to request the data information from said data source wherein said transmission unit comprises a <b><u>satellite data unit</u></b> and a <b><u>radio frequency unit</u></b>;</p>	<p>phrase does not require construction, but if the Court is inclined to construe the phrase, its plain meaning is “a system configured to enable a system user to request information.”</p> <p><b>Transmission unit:</b> a component through which information requests to the data source are transmitted. In addition, the transmission unit may act as a receiver and receive signals from the data source.</p> <p><b>Satellite data unit:</b> Honeywell believes this claim phrase does not require construction, but if the Court is inclined to construe the phrase, its plain meaning is “a communications unit that facilitates communications via satellite.</p> <p><b>Radio frequency unit:</b> Honeywell believes this claim phrase does not require</p>	<p>user, such as a passenger on an aircraft, ship or automobile, to request information from the data source 104 via the first communication medium 208.”)</p> <p><b>‘152 Patent.</b> ‘152 col.6 ll.13-21 (“Information requests are transmitted to the data source 104 by the transmission unit 206 via first communication medium 208. Moreover, the transmission unit 206 may also be configured as a transceiver to receive data signals from data source 104 through transmission medium 208.”)</p> <p><b>‘152 Patent.</b> ‘152 fig. 3; <i>id.</i> col.6 l. 63 to col.7 l. 2 (“Referring to FIGS. 3 and 6, transmission unit 306 suitably includes a satellite data unit (SDU) 602 for facilitating communications via satellite, particularly transmitting the request from the information request system 102 to the data source 104. The SDU receives the request and generates a corresponding signal to be transmitted according to any suitable satellite communication technique.”)</p> <p><b>‘152 Patent.</b> ‘152 col.7 ll.37-42 (“In addition, transmission unit 306 may further include a conventional radio frequency unit (RFU) 610</p>

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	construction, but if the Court is inclined to construe the phrase, its plain meaning is “a radio frequency communications unit.”	configured to provide additional channels of communication.”)
a <b><u>first communication medium</u></b> configured for transmission of requests for the data information from the information request system to said data source, said first communication medium comprising:	<b>First communication medium:</b> Honeywell believes this claim phrase does not require construction, but if the Court is inclined to construe the phrase, its plain meaning is “any suitable media or combination of media for transmitting data requests from transmission unit to the data source.”	<b>‘152 Patent.</b> ‘152 col.2 ll.45-47 (“The first and second communication media 208, 210 may be the same or different media, or separate channels of the same medium.”), col.8 ll.1-11 (“[T]he first communication medium [ ] may comprise any suitable medium. . . [and] may comprise multiple media, which may be used individually or in any appropriate combination to transfer requests to the data source 104.”)
an <b><u>aeronautical satellite system</u></b> and a ground station, wherein said aeronautical satellite system is adapted to transmit data information requests from said satellite data unit to said ground station, said ground station being coupled to said	<b>Aeronautical satellite system:</b> Honeywell believes this claim phrase does not require construction, but if the Court is inclined to construe the phrase, its plain meaning is “at least one satellite configured to receive data request signals from the transmission unit and forward or transmit the signals to a ground earth station.”	<b>‘152 Patent.</b> ‘152 col.8 ll.25-28 (“Aeronautical satellite system 310 preferably comprises a satellite unit configured to receive data request signals from transmission unit 306 and forward or transmit the signals to ground earth station 310, i.e., serve as a repeater for the data request signals. Preferably, satellite system 310 comprises an array of satellites strategically orbiting the world, such as the Inmarsat Aeronautical Satellite Communications System or any other suitable satellite communication system, to facilitate the efficient communication of signals substantially regardless of the location of

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network system to facilitate the transferring of said data information requests to said network system; and		transmission unit 306.”)
a radio ground station adapted to receive information request signals from said radio frequency unit, wherein said radio ground station is adapted to transmit data information requests from said radio frequency unit to said network system;		
a <b><u>second communication medium</u></b> comprising a <b><u>direct broadcast satellite</u></b> adapted to receive data information from said data source and to broadcast said data information to said	<b>Second communication medium:</b> Honeywell believes this claim phrase does not require construction, but if the Court is inclined to construe the phrase, its plain meaning is “any medium, plurality or combination of media capable of transmitting information from the data source to the receiver.	<b>‘152 Patent.</b> ‘152 col.2 ll.45-47 (“The first and second communication media 208, 210 may be the same or different media, or separate channels of the same medium.”), col.3 ll.15-20 (“In accordance with various aspects of the present invention, however, second communication medium 210 may comprise any medium or plurality of media capable of transmitting information from data source 104 to receiver 106.”); and <i>id.</i> col.3 ll.38-41 (“Further, the second communication medium 210 may comprise

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receiver;	<p>The first and second communication media may be the same or different media, or separate channels of the same medium.”</p> <p><b>Direct broadcast satellite:</b> a satellite that facilitates access to greater bandwidth than reliance solely on the telephone system and affords relatively high data transfer rates from the data source to the receiver.</p>	<p>multiple media, which may be used individually or in any suitable combination to transfer requests to the data source 104.”)</p> <p><b>‘152 Patent.</b> ‘152 col.3 ll.4-15 (“The satellite link 319 facilitates access to greater bandwidth than reliance solely on the telephone system 314 and affords relatively high data transfer rates from the data source 104 to the receiver 106. Accordingly, the second communication medium 210 of the present embodiment comprises a satellite link between the data source 104 and the receiver 106.”)</p>
a receiver coupled to said data source by said second communication medium and adapted to receive the data information requested by said information request system from said data source; and		
wherein said information request system is configured to select one of said		

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aeronautical satellite system and said radio ground station from said first communication medium for transmission of data information requests.		
<b>Claim 2</b>		
2. A data communications system according to claim 1, wherein said network system comprises a <b><u>direct broadcasting system</u></b> .	<b>Direct broadcasting system:</b> <i>see claim 4, "direct broadcast system."</i>	
<b>Claim 3</b>		
3. A data communications system according to claim 1, wherein said <b><u>information request system</u></b> further comprises a wireless LAN unit and said first communication		

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medium further comprises:		
a LAN ground station adapted to receive information request signals from said wireless LAN unit, wherein said LAN ground station is adapted to transmit data information requests from said wireless LAN unit to said network system, and said network system is adapted to transfer information requests signals to said data source.		
<b>Claim 4</b>		
4. A method for providing and controlling data communications from a <b><u>direct broadcast system</u></b> to a passenger carrier, said method	<b>Direct broadcast system:</b> a system for broadcasting information to a receiver via a satellite that facilitates access to greater bandwidth than reliance solely on the telephone system and affords relatively high data	<b>‘152 Patent.</b> ‘152 col.3 ll.4-15 (“The satellite link 319 facilitates access to greater bandwidth than reliance solely on the telephone system 314 and affords relatively high data transfer rates from the data source 104 to the receiver 106. Accordingly, the second communication medium 210 of the present embodiment comprises a satellite link between the

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comprising the steps of:	transfer rates from the data source to the receiver.	data source 104 and the receiver 106.”)
transmitting data information requests from an <b><u>information request system</u></b> to a ground station, said transmitting of data information requests provided through one of satellite transmission signals and radio transmission signals by way of selection between one of a <b><u>satellite data unit</u></b> and a <b><u>radio frequency unit</u></b> ;	<b>Information request system:</b> <i>see claim 1.</i>  <b>Satellite data unit:</b> <i>see claim 1.</i>  <b>Radio frequency unit:</b> <i>see claim 1.</i>	
transmitting the data information requests from said ground station to said broadcast system through a <b><u>network system</u></b> ;	<b>Network system:</b> <i>see claim 1.</i>	
accessing data information		



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corresponding to the data information request from said direct broadcast system;		
transmitting the data information from said direct broadcast system to a <b><u>direct broadcast satellite</u></b> ; and	<b>Direct broadcast satellite:</b> <i>see claim 1.</i>	
<b><u>broadcasting</u></b> the data information from said direct broadcast satellite to a receiver provided onboard said passenger carrier.	<b>Broadcasting:</b> Honeywell believes this claim phrase does not require construction, but if the Court is inclined to construe the phrase, its plain meaning is "transmitting."	<b>MERRIAM-WEBSTER'S COLLEGIATE DICTIONARY 144 (10<sup>th</sup> ed. 1997)</b> (defining "broadcast" as "to transmit or make public by means of radio or television; to transmit a broadcast").
<b>Claim 5</b>		
5. A method according to claim 4, wherein said step of transmitting data information requests from said information request system to said ground station comprises:		
transmitting the data		

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information requests from said satellite data unit to an aeronautical satellite system utilizing said satellite transmission signals;		
and transmitting the data information requests from said aeronautical satellite system to said ground station using said satellite transmission signals.		
<b>Claim 6</b>		
6. A method according to claim 4, wherein said step of transmitting data information requests from said information request system to said ground station comprises:		
<u><b>selecting</b></u> one of a group of transmission mediums comprising	<b>Selecting:</b> Honeywell believes this claim phrase does not require construction, but if the	<b>‘152 Patent.</b> ‘152 col.6 ll.23-50 (“In the present embodiment, transmission unit 206 includes multiple transmission mechanisms 810 available for

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<p>an <u>aeronautical satellite system</u>, a <u>radio frequency system</u>, a <u>wireless LAN system</u> and a <u>voice channel system</u> for transmission of the data information requests.</p>	<p>Court is inclined to construe the phrase, its plain meaning is "choosing."</p> <p><b>Radio frequency system:</b> Honeywell believes this claim phrase does not require construction, but if the Court is inclined to construe the phrase, its plain meaning is "a radio frequency communications system."</p>	<p>transmitting the request to the data source 104, and a selection system 808 for selecting the appropriate transmission mechanism 810 . . . The selection system 808 suitably selects the transmission mechanism 810 for transmitting a request to the data source 104. In the present embodiment, the selection system 808 is implemented by the aircraft LAN 204, though the selection system 808 may be implemented in any suitable manner, such as by an independent microprocessor-based system, a dedicated controller, dedicated logic, or a software-based solution."), col.9 l. 65 to col.10 l. 19 ("Accordingly, the information request system 102 may select an appropriate transmission mechanism 510 for submitting requests to the data source 104 according to any appropriate criteria.")</p> <p><b>'152 Patent.</b> '152 patent, fig. 5; <i>id.</i> col.8 ll.8-18 ("For example, referring to FIGS. 3-5, various components of the first communication medium 208 suitably include satellites, earth stations such as satellite and VHF communication ground stations [the embodiment of the radio frequency system], wire and optical networks, such as telephone, cable, and power networks, computer networks, and any other suitable communications medium for transmitting the request to the data source 104."); <i>id.</i> col.7 ll.43-44 ("in the present embodiment, RFU 610 comprises a VHF</p>

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	<p><b>Wireless LAN system:</b> Honeywell believes this claim phrase does not require construction, but if the Court is inclined to construe the phrase, its plain meaning is "a ground-based wireless LAN and network system that can transmit request signals to the data source."</p> <p><b>Voice channel system:</b> Honeywell believes this claim phrase does not require construction, but if the Court is inclined to construe the phrase, its plain meaning is "a system configured to receive voice channel communications."</p>	<p>radio unit 406."); and <i>id.</i> col.9 ll.12-15 ("Accordingly, upon receiving information request signals from VHF radio unit 406, VHF ground station 412 is suitably configured to transmit the request signals to network system 314, or alternatively, directly to data source 104.)</p> <p><b>'152 Patent.</b> '152 patent, fig. 5; <i>id.</i> col.8 ll.8-18 ("For example, referring to FIGS. 3-5, various components of the first communication medium 208 suitably include satellites, earth stations such as satellite and VHF communication ground stations, wire and optical networks, such as telephone, cable, and power networks, computer networks, and any other suitable communications medium for transmitting the request to the data source 104."); <i>id.</i> col.9 ll.18-26 ("Further, referring to FIG. 5, first communication medium 104 may also include a ground-based LAN 512 and network system 314.")</p> <p><b>'152 Patent.</b> '152 patent, fig. 5; <i>id.</i> col.8 ll.8-18 ("For example, referring to FIGS. 3-5, various components of the first communication medium 208 suitably include satellites, earth stations such as satellite and VHF communication ground stations, wire and optical networks, such as telephone, cable, and power networks, computer networks, and any other suitable communications medium for transmitting the request</p>

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		to the data source 104.”); <i>id.</i> col.9 ll.37-41 (“First communication medium 208 may also accommodate transmission of requests over available voice channels. Accordingly, first communication medium 208 may comprise a voice channel communication protocol and a ground station configured to receive voice channel communications.”)
<b>Claim 7</b>		
7. A data communications system for a passenger carrier, said system comprising:		
a <b><u>transmission unit</u></b> comprising a <b><u>satellite data unit</u></b> and a <b><u>radio frequency unit</u></b> , located on board said passenger carrier and operatively connected to a user interface, said transmission unit being configured to select one of said satellite data unit and said radio frequency unit for transmission of the	<b>Transmission unit:</b> <i>see claim 1.</i>  <b>Satellite data unit:</b> <i>see claim 1.</i>  <b>Radio frequency unit:</b> <i>see claim 1.</i>  <b>Aeronautical satellite system:</b> <i>see claim 1.</i>	

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<p>information request signals, said satellite frequency unit configured for providing satellite transmission signals to an <b><u>aeronautical satellite system</u></b>, said aeronautical satellite system being adapted to provide the information request signals to said ground station, and said radio frequency unit for providing radio transmission signals to said ground station, wherein said ground station is adapted to receive the radio transmission signals and transmit said signals to said ground network;</p>		
<p>a ground station for receiving information request signals from</p>		

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said transmission unit;		
a <b><u>direct broadcast system</u></b> for providing data information;	<b>Direct broadcast system:</b> <i>see claim 1.</i>	
a ground network for linking said ground station and said direct broadcast system to facilitate communications;		
a <b><u>direct broadcast satellite</u></b> , said direct broadcast satellite adapted to interface and communicate with said direct broadcast system; and	<b>Direct broadcast satellite:</b> <i>see claim 1.</i>	
a receiver located onboard said passenger carrier and adapted to receive data signals broadcast from said direct broadcast satellite, said receiver being operatively connected to said user interface to facilitate the transmission of said		

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data information from said direct broadcast system to passengers.		
<b>Claim 8</b>		
8. A data communications system according to claim 7, wherein said transmission unit further comprises a wireless LAN unit, said transmission unit being configured to select one of said satellite data unit, said radio frequency unit and said wireless LAN unit for transmission of the information request signals.		
<b>Claim 10</b>		
10. A data communications system for retrieving data information, said data communications		



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system comprising:		
a <b><u>data source</u></b> comprising a <b><u>network system</u></b> for the storage and delivery of the data information;	<b>Data source:</b> <i>see claim 1.</i>  <b>Network system:</b> <i>see claim 1.</i>	
an <b><u>information request system</u></b> comprising a <b><u>transmission unit</u></b> coupled to said data source and adapted to request the data information from said data source, wherein said <b><u>transmission unit</u></b> comprises a <b><u>satellite data unit</u></b> , a <b><u>radio frequency unit</u></b> , and a wireless LAN unit;	<b>Information request system:</b> <i>see claim 1.</i>  <b>Transmission unit:</b> <i>see claim 1.</i>  <b>Satellite data unit:</b> <i>see claim 1.</i>  <b>Radio frequency unit:</b> <i>see claim 1.</i>	
a <b><u>first communication medium</u></b> configured for transmission of requests for the data information from the information requests	<b>First communication medium:</b> <i>see claim 1.</i>	

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system to said data source, said first communication medium comprising:		
an <b><u>aeronautical satellite system</u></b> and a ground station, wherein said aeronautical satellite system is adapted to transmit data information request from said satellite data unit to said ground station, said ground station being coupled to said network system to facilitate the transferring of said data information requests to said network system; and	<b>Aeronautical satellite system:</b> <i>see claim 1.</i>	
a radio ground station adapted to receive information request signals from said radio frequency unit, wherein said radio		

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ground station is adapted to transmit data information requests from said radio frequency unit to said network system; and		
a LAN ground station adapted to receive information request signals from said wireless LAN unit, wherein said LAN ground station is adapted to transmit data information requests from said wireless LAN unit to said network system, and said network system is adapted to transfer information request signals to said data source;		
a <b><u>second communication medium</u></b> comprising a <b><u>direct broadcast</u></b>	<b>Second communication medium:</b> <i>see claim 1.</i>  <b>Direct broadcast satellite:</b> <i>see</i>	

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<u><b>satellite</b></u> adapted to receive data information from said data source and to broadcast said data information to said receiver;	<i>claim 1.</i>	
a receiver coupled to said data source by said second communication medium and adapted to receive the data information requested by said information request system from said data source; and		
wherein said information request system is configured to select one of said aeronautical satellite system, said radio ground station and said LAN ground station from said first communication medium for		

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transmission of data information requests.		
<b>Claim 11</b>		
<p>11. A data communications system according to claim 10, wherein said information request system comprises a <b><u>selection system</u></b> configured to select one of said aeronautical satellite system, said radio ground station and said LAN ground station from said communication mediums for transmission of data information requests to said data source.</p>	<p><b>Selection system:</b> Honeywell believes this claim phrase does not require construction, but if the Court is inclined to construe the phrase, its plain meaning is “a part of the information request system used to select a transmission mechanism or mechanisms for transmitting the data request to the data source.”</p>	<p><b>'152 Patent.</b> '152 col.6 ll.23-50 (“In the present embodiment, transmission unit 206 includes multiple transmission mechanisms 810 available for transmitting the request to the data source 104, and a selection system 808 for selecting the appropriate transmission mechanism 810 . . . The selection system 808 suitably selects the transmission mechanism 810 for transmitting a request to the data source 104. In the present embodiment, the selection system 808 is implemented by the aircraft LAN 204, though the selection system 808 may be implemented in any suitable manner, such as by an independent microprocessor-based system, a dedicated controller, dedicated logic, or a software-based solution.”); <i>id.</i> col.9 l. 65 – col.10 l. 19 (“Accordingly, the information request system 102 may select an appropriate transmission mechanism 510 for submitting requests to the data source 104 according to any appropriate criteria.”)</p>